

E-filed 2/9/07

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Co-Lead Counsel for Plaintiffs

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN JOSE DIVISION**

IN RE TRIDENT MICROSYSTEMS)
 INC. DERIVATIVE LITIGATION)

Master File No. C-06-3440-JF

 This Document Relates To:)
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 All Actions)

**STIPULATION AND [PROPOSED]
 ORDER TO EXTEND SCHEDULE
 FOR FILING OF AMENDED
 CONSOLIDATED COMPLAINT**

WHEREAS, this is a consolidated shareholder derivative action brought on behalf of Trident
 Microsystems, Inc. (“Trident”) against certain officers and directors of Trident;

1 WHEREAS, Lead Plaintiffs filed their Consolidated Shareholder Derivative Complaint in the
2 instant action on November 7, 2006;

3 WHEREAS, the Individual Defendants and nominal defendant Trident (collectively
4 “Defendants”) filed their Motions to Dismiss Lead Plaintiffs’ Consolidated Derivative Complaint on
5 December 21, 2006;

6 WHEREAS, the deadline for Lead Plaintiffs’ response to the Motions to Dismiss Lead
7 Plaintiffs’ Consolidated Derivative Complaint is February 5, 2007;

8 WHEREAS, the parties have met and conferred regarding the scheduling of the Lead
9 Plaintiffs’ response to the Motions to Dismiss Lead Plaintiffs’ Consolidated Derivative Complaint;

10 WHEREAS, Lead Plaintiffs intend to file an Amended Consolidated Derivative Complaint;
11 and;

12 WHEREAS, the agreed-upon extension is not for the purpose of delay and promotes judicial
13 efficiency;

14 IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned, subject to
15 the approval of the Court, that Lead Plaintiffs shall no later than March 7, 2007 file and serve an
16 Amended Consolidated Derivative Complaint (“Amended Complaint”) which will supersede all
17 existing complaints filed in this action. Defendants need not respond to the pre-existing complaints and
18 Lead Plaintiffs need not respond to Defendants’ Motions to Dismiss Lead Plaintiffs’ Consolidated
19 Derivative Complaint; and

20 IT IS FURTHER STIPULATED AND AGREED that Nominal Defendant Trident’s response to
21 the Amended Complaint will be due no later than forty (40) days from the date of service. In the event
22 that Trident responds by a motion to dismiss the Amended Complaint for failure to plead that making a
23 demand would have been futile (pursuant to Fed. R. Civ. P. 23.1), Lead Plaintiffs shall file and serve

1 their opposition within forty-five (45) days after service of Trident's motion, and Trident shall file and
2 serve a reply to Lead Plaintiffs' opposition within fifteen (15) days after service of the opposition.
3 Trident will notice the motion for the earliest available hearing date accommodating this briefing
4 schedule, unless otherwise agreed by Trident and Lead Plaintiffs.

5
6 IT IS FURTHER STIPULATED AND AGREED that, if Trident files a motion to dismiss as
7 contemplated above, the Individual Defendants need not respond to the Amended Complaint unless and
8 until Trident's motion to dismiss is denied. If Trident's motion to dismiss is denied, or if Trident does
9 not file a motion to dismiss and instead files an alternative response, the Individual Defendants will file
10 and serve their responses to the Amended Complaint within forty-five (45) days of notice of the Court's
11 order denying Trident's motion to dismiss or Trident's filing of the alternative response.
12
13

14 IT IS SO STIPULATED.

15
16 DATED: February 5, 2007

LERACH COUGHLIN STOIA GELLER
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19 Co-Lead Counsel for Plaintiffs

20 I, SHAWN A. WILLIAMS, am the ECF User whose ID and password are being used to file
21 this STIPULATION AND [PROPOSED] ORDER. In compliance with General Order 45, X.B., I
22 hereby attest that CHARLES J. LANDY has concurred in this filing.

23 DATED: February 5, 2007

24 PILLSBURY WINTHROP SHAW
25 PITTMAN LLP
26 CHARLES J. LANDY
27 WALTER J. ROBINSON
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Counsel for Defendant John S. Edmunds

I, SHAWN A. WILLIAMS, am the ECF User whose ID and password are being used to file this STIPULATION AND [PROPOSED] ORDER. In compliance with General Order 45, X.B., I hereby attest that JUSTIN S. CHANG has concurred in this filing.

DATED: February 5, 2007

SHEARMAN & STERLING LLP
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/s/

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Counsel for Defendant Frank C. Lin

I, SHAWN A. WILLIAMS, am the ECF User whose ID and password are being used to file this STIPULATION AND [PROPOSED] ORDER. In compliance with General Order 45, X.B., I hereby attest that SARAH A. GOOD has concurred in this filing.

DATED: February 5, 2007

HOWARD RICE NEMEROVSKI
CANADYFALK & RABKIN, PC
SARAH A. GOOD
CLARA J. SHIN
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Counsel for Defendants Glen M. Antle, Jung-Herng Chang, Peter Jen, Gerry Liu, John Luke, Amir Mashkoori, Millard Phelps, and W. Stephen Rowe and specially appearing for Yasushi Chikagami

I, SHAWN A. WILLIAMS, am the ECF User whose ID and password are being used to file this STIPULATION AND [PROPOSED] ORDER. In compliance with General Order 45, X.B., I hereby attest that DAVID PRIEBE has concurred in this filing.

DATED: February 5, 2007

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SHIRLI FABBRI WEISS
DAVID PRIEBE

/s/

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Counsel for Nominal Defendant Trident
Microsystems, Inc.

* * *

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: 2//9/07



UNITED STATES DISTRICT JUDGE
JEREMY FOGEL

CERTIFICATE OF SERVICE

I hereby certify that on February 5, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I have mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

s/ Shawn A. Williams

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Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

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